

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: COLUMBIA COLLEGE RANKINGS
ACTION

Case No. 1:22-cv-05945-PGG

(Consolidated with Case
No. 1:22-cv-06567-PGG)

**NOTICE OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE THAT, upon the Declaration of Thomas J. McKenna, sworn to on June 30, 2025, and the accompanying exhibits and memorandum of law, and upon all prior proceedings, pleadings, and filings in the above-captioned action, Plaintiffs Ravi Campbell, Student B, Raphael Silverman, and Bruce Acosta will move this Court at the United States District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007, before the Honorable Paul G. Gardephe, United States District Judge, for an Order under Federal Rule of Civil Procedure 23 that (i) preliminarily approves the Settlement;¹ (ii) conditionally certifies the Settlement Class; (iii) appoints Plaintiffs as class representatives; (iv) appoints Class Counsel; (v) appoints Strategic Claims Services as the Settlement Administrator and escrow agent; (vi) approves the proposed Notice Plan (*see* accompanying Declaration of Paul Mulholland) and the proposed Short Form and Long Form Notices (attached as Exhibits C and D to the Settlement Agreement); (vii) sets a schedule leading to the Court's evaluation of whether to finally approve the Settlement; and (viii) stays all proceedings in the Action except those relating to approval of the Settlement. *See* [Proposed] Preliminary Approval Order, filed herewith.

¹ Unless otherwise noted, all capitalized terms herein shall have the same meaning as set forth in the Stipulation of Settlement, attached as Exhibit 1 to the Declaration of Thomas J. McKenna filed contemporaneously herewith.

Dated: June 30, 2025
New York, New York

Respectfully submitted,

GAINEY McKENNA & EGLESTON

/s/ Thomas J. McKenna

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Class***